

UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF FLORIDA  
ORLANDO DIVISION

In re:

PIERRE LETANG

CASE NO.: 8:18-bk-10770-MGW  
Chapter 13

Debtor/

**DEBTOR'S MOTION TO MODIFY CONFIRMED PLAN, ABATE AND CURE  
ARREARAGE IN THIS CASE AND ADD IN BANK OF AMERICA'S POST PETITION  
MORTGAGE FEES FILED ON APRIL 18, 2022 IN THE AMOUNT OF \$839.00**

NOTICE OF OPPORTUNITY TO OBJECT AND FOR HEARING

If you object to the relief requested in this paper you must file a response with the Clerk of Court at 801 N Florida Avenue, Suite 555, Tampa Florida 33602-3899 and mail a copy to the moving party at , Jonathan D Eichelberger, Esquire, Myers, Eichelberger & Russo, P.L., 5750 Major Boulevard, Suite 250, Orlando, Florida 32819 within 21 days from the date of the attached proof of service, plus an additional three days if this paper was served on any party by U.S. Mail.

If you file and serve a response within the time permitted, the Court will either notify you of a hearing date or the Court will consider the response and grant or deny the relief requested in this paper without a hearing. If you do not file a response within the time permitted, the Court will consider that you do not oppose the relief requested in the paper, and the Court may grant or deny the relief requested without further notice or hearing

You should read these papers carefully and discuss them with your attorney if you have one. If the paper is an objection to your claim in this bankruptcy case, your claim may be reduced, modified, or eliminated if you do not timely file and serve a response.

The Debtor, PIERRE R. LETANG requests entry of an order permitting the Debtor to modify the Confirmed Plan, and in support thereof would state as follows:

1. Debtor filed for relief under Chapter 13 of the United States Bankruptcy Code on December 17, 2018.

2. Debtor would like to modify confirmed plan, abate and cure arrearage in this case and add Bank of America post-petition fees, expenses and charges filed on April 22, 2022 in the amount of \$839.00. Bank of America will be paid in full with an interest rate of 6.84% per annum for a total amount of \$71,355.66. Ongoing post -petition taxes and insurance will be paid directly by Debtor.

3. Starting October 17, 2022, debtors new payment should be \$3,856.00 until the end of term.

**WHEREFORE**, Debtor, Pierre Letang requests the entry of an order modifying the Confirmed Plan, and such other and further relief as this Court deems just and proper.

Respectfully submitted this 23<sup>rd</sup> day of September, 2022.

**/s/ Jonathan D Eichelberger**

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### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion has been provided in the manner stated below: on this 23<sup>rd</sup> day of September, 2022.

#### **TO BE SERVED BY ELECTRONIC FILING:**

- Kelly Remick, Chapter 13 Trustee ([USTPRegion21.TP.ECF@USDOJ.GOV](mailto:USTPRegion21.TP.ECF@USDOJ.GOV))
- United States Trustee ([USTPRegion21.TP.ECF@USDOJ.GOV](mailto:USTPRegion21.TP.ECF@USDOJ.GOV))
- William C Harrison ([will.harrison@ch13tampa.com](mailto:will.harrison@ch13tampa.com))
- Joe G Tedder Polk County Tax Collector ( [lisawells@polktaxes.com](mailto:lisawells@polktaxes.com))
- Bank of America NA., Attention: Christopher K Baxter ([BKinquiries@mlg-defaultlaw.com](mailto:BKinquiries@mlg-defaultlaw.com))
- Frederic J DiSpigna ( [fdispigna@mlg-defaultlaw.com](mailto:fdispigna@mlg-defaultlaw.com))
- Wendy J Wasserman ( [wwasserman@mlg-defaultlaw.com](mailto:wwasserman@mlg-defaultlaw.com))

#### **TO BE SERVED BY mail**

**All parties on attached service list.**

**/s/ Jonathan D Eichelberger**

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